



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

2890 WOODBRIDGE AVENUE

EDISON, NEW JERSEY 08837-3679

**UPS OVERNIGHT AND EMAIL**

September 6, 2016

Mr. Kenneth H. Stroebe  
Sr. Environmental Project Manager  
The Sherwin-Williams Company  
101 Prospect Avenue, NW  
Cleveland, OH 44115

RE: Revisions to the United States Avenue Burn Site Final Report

Dear Mr. Stroebe:

Attached are the U.S. Environmental Protection Agency's (EPA) comments regarding the REPORT OF INVESTIGATION FOR THE UNITED STATES AVENUE BURN SITE (Final Report) dated September 2000 submitted by Roy F. Weston under the direction of Sherwin-Williams. As per Paragraph 47.C. of the Administrative Order on Consent for Removal Action, Index No. II-CERCLA-95-0112, each of the attached comments must be specifically addressed and the revised Final Report, resubmitted to EPA within five business days of receipt of these comments.

Contact me at 732-906-6191 with any questions.

Sincerely,

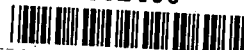
A handwritten signature in cursive script that reads "Thomas P. Budroe".

Thomas P. Budroe, OSC  
Removal Action Branch

Enc.

cc: M. Pane, EPA-RAB  
R. Klimcsak, EPA-NJRB  
C. Beitin, EPA-ORC  
M. Capichioni, Sherwin-Williams

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U.S. Environmental Protection Agency's (EPA) Comments Regarding the  
REPORT OF INVESTIGATION FOR THE UNITED STATES AVENUE BURN SITE  
Dated September 2000

1. Delete the Feasibility Study (FS) and the Preliminary Screening Risk Assessment (PSRA). Also, delete all references made regarding the FS and PSRA throughout the document.
2. Page ES-1, paragraph (para) 2, delete, "Sherwin-Williams owned Block 23, Lot 1 and Block 25, Lot 1 between 1967 and 1981. Prior to that time, the facility was owned and operated by John Lucas & Co. In addition, portions of Block 23, Lot 1 and Block 25, Lot 1 had been operated by the Borough of Gibbsboro as a landfill for the disposal of municipal waste. At a later time, Sherwin-Williams constructed bermed areas in a portion of Block 25 for the temporary storage of sludge generated from the facility's wastewater system." and insert, "John Lucas and Company owned Block 23, Lot 1 and Block 25, Lot 1 for some time prior to 1935. Lucas and Sherwin-Williams used the area as a landfill and temporary storage for sludge and other wastes generated from the facility until approximately 1977. In addition, the Borough of Gibbsboro was permitted to use the area as a dumping area for municipal wastes."
3. Page 1-7, para 4, delete, "Regional Administrator, Region 2".
4. Page 1-17, para 5, states, "Analytical results indicate that barium and calcium were detected in the soil sample at concentrations exceeding the NJDEP RDCSCC of 700 mg/kg and 1.0 mg/kg, respectively." EPA believes, "calcium" is a typo and perhaps should be, "cadmium". Please check this suspected typo and correct as applicable.
5. Page 3-6, para 2, states, "These readings at TP-25 did not seem to be affiliated with fill; rather, the elevated readings appear to be attributable to an organic peat-like layer underlying the fill at approximately 4.5 feet bgs." The readings may have been originating from the peat-like material but the aforementioned peat may have been contaminated making the statement misleading. Please delete the quoted language.
6. Page 4-16, para 1, states, "Therefore, the SVOCs detected can be attributed to the drilling activities." After, "detected" insert, "at this location below the colored material may" and delete, "can".
7. Page 5-4, para 3, states, "Although benzene and pentachlorophenol were detected at concentrations above the GWQS, they are not considered to be a concern because these compounds will naturally attenuate under aerobic conditions. Monitored natural attenuation is expected to address these VOC and SVOC compounds. Further, the shallow aquifer is not being used for potable purposes in the vicinity of the site." Please replace the aforementioned quoted language with the following language largely duplicated from page ES-2, "Benzene and pentachlorophenol were detected at concentrations above the GWQS. Groundwater data from the shallow aquifer suggests these compounds may naturally attenuate under aerobic conditions. Monitored natural attenuation may address these VOC and SVOC compounds. Further, the shallow aquifer is currently not being used for potable purposes in the vicinity of the site."